

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

CASE NO: 2:15-MD-02641-DGC
MDL No. 2641

This Document Relates to:
2:16-cv-00393-DGC
Michelle Boudreau vs. Bard, et al.

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached short form complaint to correct Paragraph 2 to read “Jimmy Kerlin” instead of Not applicable, Paragraph 4 to read “Massachusetts” instead of Georgia, Paragraph 10 to read “G2® Vena Cava Filter” instead of G2® Express (G2®X) Vena Cava Filter, and Paragraph 12 to read “Count XV: Loss of Consortium.” (see Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).

2. Plaintiff’s counsel has conferred with Defendants’ counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Michelle Boudreau requests that this Court grant this request to correct Paragraph 2 to read “Jimmy Kerlin,” Paragraph 4 to read “Massachusetts,” Paragraph 10 to read “G2® Vena Cava Filter,” and Paragraph 12 to read “Count XV: Loss of Consortium” and for leave to file the Amended Second Amended Master Short Form Complaint

for Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the attached Amended Second Amended Master Short Form Complaint.

Dated: February 15, 2017

/s/ Joseph R. Johnson
Joseph R. Johnson, Bar No: 372250
Babbitt & Johnson, P.A.
1641 Worthington Road
Suite 100
West Palm Beach, FL 33402-4426
Telephone: (561) 684-2500
Facsimile: (561) 684-6308
jjohnson@babbitt-johnson.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson